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10 Attorneys for Defendants
11 Wachovia Securities, LLC
12 n/k/a Wells Fargo Advisors, LLC
13 and George Gordon, III

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 GREGORY R. RAIFMAN and SUSAN
17 RAIFMAN, husband and wife, individually and
18 on behalf of their marital community and as
19 Trustees of the RAIFMAN FAMILY
20 REVOCABLE INTERVIVOS TRUST and as
21 beneficiaries of the PALLADIAN TRUST;
22 GEKKO HOLDINGS, LLC, and HELICON
23 INVESTMENTS, LTD.,

24 Plaintiffs,

25 v.

26 WACHOVIA SECURITIES, LLC, N/K/A
27 WELLS FARGO ADVISORS, LLC; GEORGE
28 GORDON, III, individually; and ROBERT
EDDY, individually,

Defendants.

Case No. C 11-02885 TEH

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

Action Filed: April 1, 2011
[Removed from California State Court]

Hon. Thelton E. Henderson

Case No. C 11-02885 TEH

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

1 Plaintiffs Gregory R. Raifman, Susan Raifman, Gekko Holdings, LLC and Helicon
 2 Investments, Ltd. (collectively, "Plaintiffs") filed their Complaint in California State Court on April
 3 1, 2011. Defendants Wachovia Securities, LLC and George Gordon, III ("Defendants") removed the
 4 action to the United States District Court for the Northern District of California on June 13, 2011.
 5 Defendants' response to the Complaint is currently due on June 20, 2011 pursuant to Federal Rule of
 6 Civil Procedure 81(c). The parties, by and through their counsel, have agreed to extend until July 8,
 7 2011, the time by which Defendants may answer or otherwise respond to the Complaint.

8 Pursuant to Local Rule 6-1, IT IS HEREBY STIPULATED AND AGREED by the parties,
 9 through their counsel, that Defendants shall have until and including July 8, 2011 to answer or
 10 otherwise to respond to Plaintiffs' Complaint filed on April 1, 2011. This extension will not alter the
 11 date of any event or deadline already fixed by Court order.

12 DATED: June 15, 2011

RONALD E. WOOD
 JENNIFER L. ROCHE
 PROSKAUER ROSE LLP


 Ronald E. Wood

Attorneys for Defendants,
 WACHOVIA SECURITIES, LLC and
 GEORGE GORDON, III

19 DATED: June 15, 2011

MARK J. WILSON
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 Mark J. Wilson

Attorney for Plaintiffs,
 GREGORY R. RAIFMAN, SUSAN
 RAIFMAN, GEKKO HOLDINGS, LLC, and
 HELICON INVESTMENTS, LTD.

